

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	<b>Bankruptcy No. 11-26720-GLT</b>
<b>MATTHEW C. ALLISON AND</b>	:	
<b>JILL K. ALLISON,</b>	:	<b>Chapter 13</b>
	:	
<b>Debtors.</b>	:	<b>Related to Document No. 314</b>
	:	
<hr/> <b>DITECH FINANCIAL, LLC, as serviced by</b>	:	<b>Related to Claim No 23-1</b>
<b>DITECH FINANCIAL, LLC,</b>	:	
	:	<b>Hearing Date: 12/14/16</b>
<b>Movant,</b>	:	
	:	<b>Hearing Time: 9:00 A.M.</b>
<b>vs.</b>	:	
	:	
<b>MATTHEW C. ALLISON, JILL K.</b>	:	
<b>ALLISON and RONDA J. WINNECOUR,</b>	:	
<b>Chapter 13 Trustee,</b>	:	
	:	
<b>Respondents.</b>	:	

**RESPONSE OF DITECH FINANCIAL, LLC TO THE DEBTORS' OBJECTION TO  
NOTICE OF MORTGAGE PAYMENT CHANGE**

Ditech Financial, LLC, (hereinafter "Ditech"), by and through its attorneys, Phelan Hallinan Diamond & Jones, LLP, hereby responds to the Debtor's Objection to Notice of Mortgage Payment Change and in support thereof avers as follows:

1. The Notices of Mortgage Payment Change filed on 4/14/16 and 10/11/16 are required by Bankruptcy Rule 3002.1(b).
2. As a long term continuing debt, the secured claim of Ditech is not discharged in this case pursuant to 11 U.S.C. Sec. 1328.
3. The disallowance of the Proof of Claim filed at Claim No. 23-1 as an untimely filed claim is not a basis for objection to a Notice of Mortgage Payment Change.

**WHEREFORE**, Ditech Financial, LLC, respectfully requests that this Honorable Court deny the Debtors' Objection.

Respectfully submitted,

PHELAN HALLINAN  
DIAMOND & JONES, LLP

Date: December 9, 2016

/s/ James A. Prostko, Esquire  
James A. Prostko, Esquire  
PA ID No. 27221  
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<b>Chapter 13 Trustee,</b>	:	
	:	
<b>Respondents.</b>	:	

**CERTIFICATE OF SERVICE**

I certify under penalty of perjury that on December 9, 2016, I served or caused to be served Ditech Financial, LLC's Response to the Debtors' Objection to Notice of Mortgage Payment Change on the parties at the addresses shown below. The types of service made on the parties were: Electronic Notification and First Class Mail.

**Service by Electronic Notification**  
AURELIUS P. ROBLETO, ESQUIRE  
ROBLETO LAW  
239 FOURTH AVENUE  
SUITE 1619  
PITTSBURGH, PA 15222  
[APR@ROBLETOLAW.COM](mailto:APR@ROBLETOLAW.COM)

RONDA J. WINNECOUR, TRUSTEE  
SUITE 3250, USX TOWER  
600 GRANT STREET  
PITTSBURGH, PA 15219

**Service by First Class Mail**  
MATTHEW C ALLISON  
113 LILAC DRIVE  
NEW CASTLE, PA 16105  
  
JILL K. ALLISON  
113 LILAC DRIVE  
NEW CASTLE, PA 16105

PHELAN HALLINAN  
DIAMOND & JONES, LLP

Date: December 9, 2016

/s/ James A. Prostko, Esquire

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